PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No.:	10/828,420
Filing Date:	April 20, 2004
Applicant:	Scott Dewey et al.
Group Art Unit:	2829
Examiner:	Ernest F. Karlsen
Title:	HIGH VOLTAGE ISOLATION DETECTION OF A FUEL CELL SYSTEM USING MAGNETIC FIELD CANCELLATION
Attorney Docket:	GP-303953

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APPELLANT'S REPLY BRIEF

This is Appellant's Reply Brief in response to the Examiner's Answer mailed August 15, 2008.

Appellant acknowledges that Kawakami states that the solar battery 1 can be replaced with a fuel cell. Appellant further acknowledges that Kawakami discloses a current detector 12 that detects a differential current between the current of the positive line and the current of the negative line from the solar battery 1. Appellant also sees that the current detector 12 shown in figure 1 includes a coil wrapped around the positive and negative lines. However, Appellant respectfully submits that there is not enough detail in the discussion of Kawakami to show that the current detector 12 employs magnetic field cancellation, as claimed. Applicant's claimed invention and

Burns show that to provide magnetic field cancellation, a magnetic field concentrator is used that has an opening, where a magnetic sensor is positioned in the opening that detects the magnetic field in the magnetic field concentrator. Kawakami does not show or discuss any of these elements. Appellant respectfully submits that there is not a clear connection between the ground fault sensing circuit of Burns and the current detector 12 of Kawakami, and therefore, the combination of Burns and Kawakami fails to teach or suggest using magnetic field cancellation in a fault isolation detection system for a fuel cell system for a proper *prima facie* case of obviousness.

Further, Appellant respectfully submits that the term "high voltage" has meaning in the electrical arts. High voltage terminology is <u>often</u> used by persons of skill in various electrical arts, and even though the specific line where high voltage ends and low voltage begins for various applications may be different, any skilled electrical person would not consider 2 volts as being high voltage, as suggested by the Examiner. Further, Appellant respectfully submits that if the load 70 in Burns or the system 3 in Kawakami were high voltage loads and systems, then they would say so.

In view of the foregoing and Appellant's Appeal Brief, Appellant respectfully submits that the Examiner has not established a *prima facie* case of obviousness and that the §103(a) rejection should be withdrawn.

Respectfully submitted,

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